



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

MEMO ENDORSED

August 4, 2020

BY ELECTRONIC MAIL – FILED UNDER SEAL, DELAYED DOCKETING

Honorable Katherine Polk Failla
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Oliver Hargreaves*, 18 Cr. 746 (KPF)

Dear Judge Failla:

With the consent of the defense, the Government writes respectfully to request a four-month adjournment of the defendant's sentencing control date, which is currently scheduled for August 5, 2020 at 3:00 p.m.

As the Court is aware, the defendant pled guilty pursuant to a cooperation agreement with the Government on February 10, 2020. Since that time, based, in part, on the defendant's cooperation, the Government has charged two individuals under docket number 20 Cr. 188 (JSR), pending before the Honorable Jed S. Rakoff. Both of those individuals were arrested in the Central District of California in or about March 2020. Trial is presently scheduled for December 1, 2020. While the Government has disclosed various materials relating to the defendant in discovery, the Government has not specifically disclosed the defendant's identity as a cooperating witness to the two individuals charged in that case.

Because the defendant's cooperation with the Government is ongoing, the Government respectfully requests that the Court adjourn the defendant's sentencing control date for a period of approximately four months, coinciding with the scheduled trial date. The Government has conferred with counsel for the defendant, Glenn Garber, Esq., who informed the Government that he consents to this request.

Letter to the Honorable Katherine Polk Failla
August 4, 2020

Moreover, because premature disclosure of the defendant's identity as a cooperating witness may endanger his safety and the integrity of ongoing Government investigations, the Government respectfully requests that all Court records in connection with the defendant's case, including his guilty plea on February 10, 2020, remain sealed and that docketing of those records continue to be delayed.

Respectfully submitted,

AUDREY STRAUSS
Acting United States Attorney

By: /s/
Christopher J. DiMase / Nicholas Folly /
Tara M. La Morte
Assistant United States Attorneys
(212) 637-2433 / 1060 / 1041
Julieta V. Lozano
Special Assistant United States Attorney
(212) 335-4025

cc: Glenn A. Garber, Esq.

Application GRANTED. Mr. Hargreaves's sentencing, previously scheduled for August 5, 2020, is hereby ADJOURNED to **December 4, 2020, at 3:00 p.m.** in Courtroom 618 of the Thurgood Marshall Courthouse, 40 Foley Square, New York, NY.

The Clerk of Court is directed to file this endorsement under seal, viewable to the Court and the defendant only.

Dated: August 4, 2020
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE